



10 December 2021

Our ref: South Staffordshire 12

Dear Sir/Madam

## South Staffordshire Local Plan Review: Preferred Options 2021

Thank you for the opportunity to comment on your consultation, we have summarised our comments within this document for your viewing. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

### The Local Plan in tackling Climate Change

We support the council's views around the urgency of climate change and acknowledge the commitment to green infrastructure (Policy HC19) as a toolset towards mitigating the impact. One of the main challenges we face through climate change are increasing intensity rainfall events and the resulting surface water management issues. Surface water management should adhere to the drainage hierarchy:

1. To ground
2. To watercourse
3. To designated surface water sewer or drain
4. To the combined sewerage system

New connections of surface water to the combined sewerage system can result in localised flood risk issues or spills of sewage from combined sewer overflows into local watercourses. These issues will become exacerbated by the increasing rainfall intensities posed by climate change.

As non-statutory consultees, wastewater service providers are reliant on the local plan and planning process to ensure surface water design decisions made today are not problematic or regrettable in the future. Progress on this can start right now in preferred options by steering development to locations which have sustainable surface water management options. If an allocation has limited discharge options for surface water, developers have little choice than to make a connection of surface water into the combined sewerage system, adding to the problem.

We would like to highlight the common misconception around the use of Sustainable Urban Drainage Systems (SuDS) in that they alone do not provide effective mitigation against the impacts of flood resilience and climate change. SuDS should be deployed coupled with the drainage hierarchy. A connection of surface water into the combined sewerage system regardless of using

SuDS is still problematic. We recognise the plans efforts on this point through Policy NB7 and through the Staffordshire County Council Sustainable Drainage Systems (SuDS) Handbook.

The plan could go along way in its aspiration for development to contribute towards flood risk reduction by limiting any new connections of surface water made to the combined sewerage system through careful allocation and/or planning policy. Another mechanism could be an ask that development discharges its surface water at a flow rate lower than current greenfield runoff rates, providing some betterment to the local community.

### Longer Term Growth Aspirations for a New Settlement

We appreciate the difficulties in identifying viable land for housing allocation to meet required targets and as such recognise the opportunity a new settlement can provide. One of the main challenges in developing a new settlement can be finding a suitable location to discharge treated effluent back to the environment without causing damage. The watercourses within the area of search identified in Appendix F are not particularly large, this creates an issue with the dilution ratio between discharged treated effluent and the watercourse baseflow. We encourage you to engage with us on proposals as soon as possible and are happy to support with evidence collection to support the proposal.

### Housing Allocations

The following two tables summarise outputs from a larger sewer capacity assessment which we have shared with you previously. These specifically highlight sites which are more sensitive to allocating and may benefit from planning policy (mostly around surface water management) to accommodate them sustainably. Sites highlighted as high risk are not showstoppers, however they are less preferable from a drainage perspective. They may be locations which require infrastructure capacity works which can be disruptive and take time to plan and deliver.

For the larger allocations in table 1 it would be beneficial to have sight of a build profile/trajectory, even if it's subject to change. Ideally developers will engage with us early on when proposing their drainage and connection strategy however they are not obliged to do so and often do not. Early engagement on these strategic sites would go a long way to helping them progress sustainably without causing issues to existing communities.

*Table 1 Larger Strategic Housing Allocations*

Policy	Name	Dwellings	Sewerage Risk	Surface Water Risk	Comment
SA1	Land East of Bilbrook	848	High	Low	Development may impact nearby combined sewer overflow. Surface water management and connection strategy is sensitive with this site.
SA2	Land at Cross Green	1200	Medium	Low	Proposal is near historical reports of flooding and a combined sewer overflow. Surface water management
SA3	Land at Linthouse Lane	1200	Medium	Low	

					and connection strategy is sensitive with this site.
SA4	Land North of Penkridge	1100	Medium	Low	Nearby sewage pumping station may need reviewing following inflow from this development. It has a history of bursts.

Table 2 SA5: Housing Allocations

Policy	Name	Dwellings	Sewerage Risk	Surface Water Risk	Comment
419a&b	Land at Keepers Lane and Wergs Hall Rd	317	High	Low	We anticipate a pumped connection may be required to drain this site; this could pose localised capacity issues. Site requires additional assessment following more information.
141	154a Walsall Road	31	High	Medium	Proposal is near historical reports of flooding. Surface water management and connection strategy is sensitive with this site.
139	Pool View, Church Bridge	46	High	Medium	
136	Land at Landywood Lane	155	High	Low	
638	Loades PLC	29	High	Low	
704	Land off Norton Lane	31	High	Low	
536a	Land off Holly Lane	84	High	Low	
239	Land west of Wrottesley Park Road (south)	150	Medium	Medium	
274	Land south of White Hill	120	Medium	Low	
255	Land at Moor Lane	22	Medium	Low	
582	North of Langley Road (adjoining City of Wolverhampton boundary)	390	Medium	Low	
228	Former Adult Training Centre off Histsons Hill	29	Low	Medium	
576	Land off Hyde Road (west)	22	Medium	Low	
463 & 284	Land off Billy Bunns Lane and Gilbert Lane	223	Medium	Low	
224	Land adjacent to 44 Station Road	85	Low	Low	Drainage hierarchy should be followed, surface water should be kept out of the combined sewerage system.
523	Land east of Wolverhampton Road	49	Low	Low	
119a	Land adjoining Saredon Road	60	Low	Low	
5	Land at Cherry Brook	88	Low	Low	
617	Four Ashes Road	63	Low	Low	
79	Land south of Kiddemore Green Road	43	Low	Low	

591	Land at Oaklands Farm (north of Limepit Lane)	44	Low	Low
272	Land east of Dunsley Drive	22	Low	Low
416	Land off Orton Lane	57	Low	Low
285, 562/415, 459	Pool House Road	218	Low	Low
286	Land adjacent 63 Sytch Lane	16	Low	Low
82	Land between AA49 Stafford Rd & School Lane	48	Low	Low
168	Land at Brinsford Lodge	81	Low	Low
397	Land adjacent to Brinsford Lodge, Brookhouse Lane	39	Low	Low
313	Land off Himley Lane	22	Low	Low
379	Land off Ivetsey Road	18	Low	Low
426a	Bridge Farm: 54 Long Street	15	Low	Low
610	Land off Marston Road/ Fenton House Lane	22	Low	Low
036c	Land at Weeping Cross (adjoining Stafford Borough)	168	Low	Low
16	Land at Pear Tree Farm	39	Low	Low
251	Hall End Farm	17	Low	Low

### West Midlands Interchange (SA7)

We are liaising with the developer and consultants around the detailed proposals for this allocation. We recognise the significance of national infrastructure projects and are actively working to bring the development online in accordance with their phase plan.

For your information we have set out some general guidelines that may be useful to you.

### Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments

will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewer system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### **Water Supply**

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

### **Water Efficiency**

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Strategic Catchment Planner

[growth.development@severntrent.co.uk](mailto:growth.development@severntrent.co.uk)